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 NEO4J, INC. and NEO4J SWEDEN AB

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NEO4J, INC., a Delaware corporation, and
 NEO4J SWEDEN AB, a Swedish
 corporation,

Plaintiffs,

v.

PURETHINK LLC, a Delaware limited
 liability company, IGOV INC., a Virginia
 corporation, and JOHN MARK SUHY, an
 individual,

Defendants.

CASE NO. 5:18-CV-07182-EJD

**[PROPOSED] ORDER RE PLAINTIFFS'
 ADMINISTRATIVE MOTION TO FILE
 PORTIONS OF PLAINTIFFS' MOTION
 FOR SUMMARY JUDGMENT AND
 EXHIBITS TO SUPPORTING
 DECLARATIONS UNDER SEAL**

AND RELATED COUNTERCLAIM.

NEO4J, INC., a Delaware corporation, and
 NEO4J SWEDEN AB, a Swedish
 corporation,

Plaintiffs,

v.

GRAPH FOUNDATION, INC., an Ohio
 corporation, GRAPHGRID, INC., an Ohio
 corporation, and ATOMRAIN INC., a
 Nevada corporation,

Defendants.

CASE NO. 5:19-CV-06226-EJD

Now before the Court is Plaintiffs Neo4j, Inc. and Neo4j Sweden AB's (collectively "Plaintiffs") Administrative Motion to File Portions of and Exhibits to Plaintiffs' Motion for Summary Judgment and Supporting Declarations Under Seal ("Administrative Motion"). Having considered the Administrative Motion and all papers submitted by Plaintiffs in support of the Administrative Motion and good cause appearing, the Court finds that:

1. There exists a compelling overriding confidentiality interests that have overcome the right of public access to the record of the following documents, and there is therefore good cause to file the documents under seal:

2.

Identification of Materials to be Sealed	Designating Party Information
Redactions to Plaintiffs' Memorandum of Points and Authorities in support of Consolidated Motion for Summary Judgment at 6:9-11 and 6:14-15.	Neo4j, Inc. and Neo4j Sweden AB's (collectively "Plaintiffs") containing confidential information drawn from Exhibits 6 and 7 to the Ratinoff MSJ Decl.
Declaration of Jeffrey M. Ratinoff in Support of Plaintiffs' Consolidated Motion for Summary Judgment ("Ratinoff MSJ Decl.") at ¶ 8, Exhibit 6 in its entirety.	Plaintiffs' private, confidential, and commercially sensitive business information
Ratinoff MSJ Decl. at ¶ 9, Exhibit 7 in its entirety.	Plaintiffs' private, confidential, and commercially sensitive business information
Ratinoff MSJ Decl. at ¶ 29, portions of Exhibit 27 from Bates stamp IGOV00000298.0002-IGO V00000298.0006	Plaintiffs' private, confidential, and commercially sensitive business information
Ratinoff MSJ Decl. at ¶ 128, Exhibit 126 in its entirety.	Plaintiffs' private, confidential, and commercially sensitive business information
Declaration of John Broad in Support of Plaintiff's Consolidated Motion for Summary Judgment ("Broad MSJ Decl.") at ¶ 8, Exhibit 3 in its entirety.	Plaintiffs' contractual obligation owed to third party copyright holder

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Broad MSJ Decl. at ¶ 22, Exhibit 12 in its entirety.	Plaintiffs' private, confidential, and commercially sensitive business information
Broad MSJ Decl. at ¶ 23, Exhibit 13 in its entirety.	Plaintiffs' private, confidential, and commercially sensitive business information

3. A substantial probability exists that overriding confidentiality interests will be prejudiced if the record is not sealed;

4. The proposed sealing is narrowly tailored; and

5. No less restrictive means exist to achieve these overriding interests.

IT IS THEREFORE ORDERED that Plaintiffs' Administrative Motion is GRANTED with respect to the documents set forth above.

IT IS SO ORDERED.

Dated: _____, 2021

Honorable Edward J. Davila